

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

PROMEDEV LLC dba RELIEF FACTOR

Plaintiff,

v.

ROBY WILSON (individual) and  
MAXXIMEDIA ADVERTISING CO; and  
DOES 1 through 25.

Defendants.

No. 2:22-cv-01063-JLR

**STIPULATED MOTION TO STAY  
PROCEEDINGS AND [PROPOSED]  
ORDER** JLR

**NOTE ON MOTION CALENDAR:  
SEPTEMBER 13, 2022**

The Parties, through their undersigned counsel, hereby file this stipulated motion, pursuant to LCR 7(d)(1) and 10(g), to request that this case be stayed through October 11, 2022. The Parties respectfully submit that good cause exists to stay all further proceedings to allow the Parties to engage in mediation and settlement discussions.

In support of their Stipulated Motion, the Parties state as follows:

WHEREAS, the Parties have agreed to mediate this litigation before the Honorable Dean S. Lum (Retired) on October 11, 2022;

WHEREAS, the Parties have agreed to stay this litigation through October 11, 2022, subject to the Court's approval, to enable them to participate in a mediation; and

WHEREAS, the Parties believe that a stay through October 11, 2022 will allow them sufficient time to prepare for and participate in mediation;

The Parties stipulate and agree that, pending the Court's approval, all further proceedings in this case should be stayed through October 11, 2022, at which point the stay will be terminated automatically, absent an extension granted by the Court. Upon termination of the stay, the Parties agree to the following briefing schedule:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Defendants' responsive pleading due	Sept. 5, 2022	Oct. 21, 2022
Deadline for FRCP 26(f) Conference	Sept. 22, 2022	Nov. 3, 2022
Plaintiff's opposition to any responsive motion filed by Defendants due	None	Nov. 14, 2022
Initial Disclosures Pursuant to FRCP 26(a)(1)	Oct. 6, 2022	Nov. 17, 2022
Defendants' reply in support of any responsive motion filed by Defendants due	None	Nov. 18, 2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f)	Oct. 13, 2022	Nov. 23, 2022

IT IS SO STIPULATED.

Respectfully submitted this 13th day of September, 2022.

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s/ Virginia Weeks

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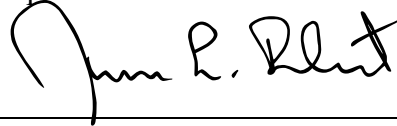
*Attorney for Imagipix Corporation,  
MaXXiMedia Advertising Co, and Roby  
Wilson*

**[PROPOSED] ORDER**

The Court hereby grants the Parties' Stipulated Motion for Stay. The stay will remain in place through October 11, 2022, at which point the following deadlines will be in effect:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Defendants' responsive pleading due	Sept. 5, 2022	Oct. 21, 2022
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IT IS SO ORDERED this 13<sup>th</sup> day of September 2022.



The Honorable James L. Robart  
United States District Judge